

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----X
REGINA HOLLOWAY,

Plaintiff,

- against -

JPMORGAN CHASE & BANK N.A.,

Defendant.
-----X

ECF

Index No. 08 CV 02146 (AKH)

RULE 26(a)
INITIAL DISCLOSURES

Pursuant to the required disclosure provision of Federal Rule of Civil Procedure 26(a), Defendants J.P. Morgan Chase & Co. ("JP Morgan Chase" or the "Bank") make the following required disclosures:

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses:

<u>Name</u>	<u>Address</u>
Mark Wenitzky	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569
Alwyn Dias	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569
Robert Donovan	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569
Debra Juntunen	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569
Jeffrey Szymanski	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-2569

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's AccessHR file, if any;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant JPMorgan Chase policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. JP Morgan Chase is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

Dated: New York, New York
July 30, 2008

JPMorgan Chase Legal Department

By: 

Talee Zur (Potter), Esq.

Attorney(s) for Defendant

One Chase Manhattan Plaza, Floor 26

New York, New York 10081

(212) 552-2569

Talee.Zur.Potter@chase.com

To: OUTTEN & GOLDEN LLP
Ossai Miazad, Esq.
Attorney(s) for Plaintiff
3 Park Avenue, 29th Floor
New York, NY 10016
(212) 245-1000

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AFFIDAVIT OF SERVICE

X

STATE OF NEW YORK)

) ss.:

COUNTY OF NEW YORK)


STUART RADESH, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by JPMorgan Chase Bank.

That on the 30th day of July, 2008 deponent served the within:


RULE 26 (a) INITIAL DISCLOSURES

UPON: OUTTEN & GOLDEN LLP
Ossai Miazad, Esq.
Attorney(s) for Plaintiff
3 Park Avenue, 29th Floor
New York, NY 10016
(212) 245-1000

at the address designated for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



Sworn to before me this
30 day of July, 2008



Notary Public

MARLENE M. THOMPSON
Notary Public, State of New York
No. 01TH6161011
Qualified in Kings County
Certificate filed in New York County
Commission Expires February 12, 2011